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AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

## UNITED STATES DISTRICT COURT

for the Eastern District of New York

ARYEH GUTMAN, individually and on behalf of  
A to Z Holding Group., A To Z CAPITAL CORP.,  
PAZ FRANKLIN COMPANY and WASHINGTON GREENE  
ASSOCIATES and, individually by 185 MARCY, LLC and  
PARK OFFICES LLC

Plaintiff

v.

03 Civ 1570 (JG)(RML)  
Civil Action No.

ALMAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COMPANY,  
OYV CORPORATION, FURNITURE MANUFACTURING GROUP.

to Z HOLDING CORP., A to Defendant

CAPITAL CORP., PAZ FRANKLING COMPANY, WASHINGTON GREENE  
ISOCIATES, JONH DOES 1-10.

**SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

To: Israel Klein

Brooklyn, New York 11204

**\* Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:


Place: Law Offices of Victor A. Worms, P.C.  
85 Broadway, Suite 750  
New York, New York 10006

Date and Time:

August 13, 2012 at 10:00 a.m.

The deposition will be recorded by this method: stenographic recording

**EX Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

*See attachment.* 

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: JUL 06 2012

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail, and telephone number of the attorney representing (name of party)

Plaintiffs

, who issues or requests this subpoena, are:

Victor A. Worms, Esq.  
65 Broadway, Suite 750  
New York, New York 10006  
212-374-9590, email: [vworms@victoraworms.com](mailto:vworms@victoraworms.com)

7/12/2012 16:09 FAX  
Jul 12 12 03:27p Klein

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ATTACHMENT

1. All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
  2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
  3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.
  4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.
  5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.
  6. The names of all limited liability companies in which you are a member, including a copy of any operating agreements and any amendments thereto.
  7. The names of any trusts in which you are the creator, the beneficiary or the trustee.
  8. Copies of your state and federal tax returns for the years 2009 to the present.
  9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.
-



AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

## UNITED STATES DISTRICT COURT

for the Eastern District of New York

ARYEH GUTMAN, individually and on behalf of  
 A to Z Holding Group., A To Z CAPITAL CORP.,  
 PAZ FRANKLIN COMPANY and WASHINGTON GREENE  
 ASSOCIATES and, individually by 185 MARCY, LLC and  
 PARK OFFICES, LLC.

Plaintiff

v.

03 Civ 1570 (JG)(RML)  
 Civil Action No.

ZALMAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COMPANY,  
 TOYV CORPORATION, FURNITURE MANUFACTURING GROUP.,

(If the action is pending in another district, state where:

A to Z HOLDING CORP., A to Defendant

Z CAPITAL CORP., PAZ FRANKLIN COMPANY, WASHINGTON GREENE

ASSOCIATES, JOHN DOE 1-10. **SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

To: Simon Klein

Brooklyn, New York 11219

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Law Offices of Victor A. Worms, P.C.  
 65 Broadway, Suite 750  
 New York, New York 10006

Date and Time:  
 August 9, 2012 at 10:00 a.m.

The deposition will be recorded by this method: stenographic recording

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

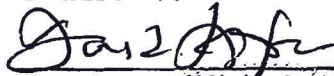
See attachment. (vaw)

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date JUL 06 2012

DOUGLAS C. PALMER

CLERK OF COURT



Signature of Clerk or Deputy Clerk

OR

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Plaintiffs, who issues or requests this subpoena, are:

Victor A. Worms, Esq.  
 65 Broadway, Suite 750  
 New York, New York 10006  
 212-374-9590, email: vworms@victorawormspsc.com

ATTACHMENT

1. All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.

2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.

3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.

4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.

5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.

6. The names of all limited liability companies in which you are a member, including a copy of any operating agreements and any amendments thereto.

7. The names of any trusts in which you are the creator, the beneficiary or the trustee.

8. Copies of your state and federal tax returns for the years 2009 to the present.

9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.



AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

## UNITED STATES DISTRICT COURT

for the Eastern District of New York

ARYEH GUTMAN, individually and on behalf of  
 A to Z Holding Group., A To Z CAPITAL CORP.,  
 PAZ FRANKLIN COMPANY and WASHINGTON GREENE  
 ASSOCIATES and, individually by 185 MARCY, LLC and  
 PARK OFFICES, LLC.

Plaintiff

v.

03 Civ 1570 (JG)(RML)  
 Civil Action No.

ZALMAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COMPANY,  
 TOYV CORPORATION, FURNITURE MANUFACTURING GROUP.,

(If the action is pending in another district, state where:

A to Z HOLDING CORP., A to

Defendants

Z CAPITAL CORP., PAZ FRANKLIN COMPANY, WASHINGTON GREENE

ASSOCIATES, JOHN DOES 1-10. **SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

To: Chesky Braun

Brooklyn, New York 11219

**Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Law Offices of Victor A. Worms, P.C.  
 65 Broadway, Suite 750  
 New York, New York 10006

Date and Time:  
 August 10, 2012 at 10:00 a.m.

The deposition will be recorded by this method: stenographic recording

**Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See attachment. (Vme)

The provisions of Fed. R. Civ. P. 45(e), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

DOUGLAS C. PALMER

Date 06 2012

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

Plaintiffs

, who issues or requests this subpoena, are:

Victor A. Worms, Esq.  
 65 Broadway, Suite 750  
 New York, New York 10006  
 212-374-9590, email: vworms@victorawormspsc.com

ATTACHMENT

1. All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.
4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.
5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.
6. The names of all limited liability companies in which you are a member, including a copy of any operating agreements and any amendments thereto.
7. The names of any trusts in which you are the creator, the beneficiary or the trustee.
8. Copies of your state and federal tax returns for the years 2009 to the present.
9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.



AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

## UNITED STATES DISTRICT COURT

for the Eastern District of New York

ARYEH GUTMAN, individually and on behalf of  
A to Z Holding Group., A To Z CAPITAL CORP.,  
PAZ FRANKLIN COMPANY and WASHINGTON GREENE  
ASSOCIATES and, individually by 185 MARCY, LLC and  
PARK OFFICES, LLC.

Plaintiff

v.

03 Civ 1570 (JG)(RML)  
Civil Action No.

ZALMAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COMPANY,  
TOYV CORPORATION, FURNITURE MANUFACTURING GROUP.,

A to Z HOLDING GORP., A to Defendant

(If the action is pending in another district, state where: )

Z CAPITAL CORP., PAZ FRANKLING COMPANY, WASHINGTON GREENE

ASSOCIATES, JONH DOES 1-10.

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: UNITED FACTORING, LLC

Brooklyn, New York 11229

**Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Law Offices of Victor A. Worms, P.C.  
65 Broadway, Suite 750  
New York, New York 10006

Date and Time:

August 7, 2012 at 10:00 a.m.

The deposition will be recorded by this method: stenographic recording

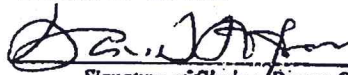
☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See attached. 

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: JUL 06 2012

CLERK OF COURT



Signature of Clerk or Deputy Clerk

OR

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Plaintiffs

Victor A. Worms, Esq., who issues or requests this subpoena, are:  
65 Broadway, Suite 750  
New York, New York 10006  
212-374-9590, email: vworms@victorawormspc.com

ATTACHMENT

1. All documents evidencing or reflecting the names and addresses of all members of United Factoring, LLC.
2. The filing receipt, operating agreement and any amendments thereto for United Factoring, LLC and any corporate resolutions for the years 2009 to the tenant present.
3. All documents reflecting or evidencing any communication or correspondence between United Factoring, LLC and Zalman Klein for the years 2009 to the present.
4. All documents reflecting or evidencing any agreements between United Factoring, LLC and Zalman Klein for the years 2009 to the present.
5. Copies of all bank statements for all bank accountants maintain by United Factoring, LLC C for the years 2009 to present.
6. All documents evidencing or reflecting all real properties owned by, United Factoring, LLC including all deeds for any such real properties.
7. Copies of the state and federal tax returns for United Factoring, LLC for the years 2009 to present.
8. A list of all lawsuits in which United Factoring, LLC is or has been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.



AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

## UNITED STATES DISTRICT COURT

for the Eastern District of New York

RYEH GUTMAN, individually and on behalf of  
to Z Holding Group., A To Z CAPITAL CORP.,  
AZ FRANKLIN COMPANY and WASHINGTON GREENE  
SSOCIATES and, individually by 185 MARCY, LLC and  
ARK OFFICES, LLC.

Plaintiff

v.

03 Civ 1570 (JG)(RML)  
Civil Action No.

ALMAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COMPANY,  
OYV CORPORATION, FURNITURE MANUFACTURING GROUP.,

(If the action is pending in another district, state where:

to Z HOLDING GORP., A to Defendant

CAPITAL CORP., PAZ FRANKLING COMPANY, WASHINGTON GREENE

SSOCIATES, JONH DOES 1-10. SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Diana Klein

Brooklyn, New York 11211

**Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Law Offices of Victor A. Worms, P.C.  
85 Broadway, Suite 750  
New York, New York 10006

Date and Time:  
August 6, 2012 at 10:00 a.m.

The deposition will be recorded by this method: stenographic recording

**Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See attachment. (KLM)

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

DOUGLAS C. PALMER

Date: 06/06/2012

CLERK OF COURT

David A. Palmer

Signature of Clerk or Deputy Clerk

OR

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Plaintiffs

, who issues or requests this subpoena, are:

Victor A. Worms, Esq.  
65 Broadway, Suite 750  
New York, New York 10006  
212-374-9590, email: vworms@victorawormspc.com

ATTACHMENT

1. All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.
4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.
5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.
6. The names of all limited liability companies in which you are a member, including a copy of any operating agreements and any amendments thereto.
7. The names of any trusts in which you are the creator, the beneficiary or the trustee.
8. Copies of your state and federal tax returns for the years 2009 to the present.
9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.